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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

11 E.K. WADE, ) Consolidated Case No. C 08-00001 JSW /  
12 Plaintiff, ) EDL  
13 v. )  
14 ELAINE CHAO, SECRETARY OF )  
15 LABOR, ET AL. )  
16 Defendant. )  
17 )  
JOINT STIPULATION AND  
[PROPOSED] ORDER TO EXTEND  
THE NON-EXPERT DISCOVERY CUT-  
OFF

WHEREAS, on October 3, 2008, the Honorable Magistrate Judge Elizabeth Laporte issued a Case Management and Pretrial Order for Jury Trial (“Case Management Order”);

WHEREAS, the Case Management Order sets the non-expert discovery cut-off for December 12, 2008;

WHEREAS, plaintiff E.K. Wade (Pro se) and the defendant Elaine Chao, Secretary of Labor, by and through her counsel (collectively the “parties”) have determined that they will not be able to complete non-expert discovery prior to December 12, 2008, and therefore have agreed to extend the non-expert discovery cut-off to February 9, 2009 and to request an order providing the same;

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1 ACCORDINGLY, it is hereby agreed by the parties, E.K. Wade and defendant Elaine Chao,  
2 Secretary of Labor, by and through her counsel, that the non-expert discovery cut-off be moved  
3 to February 9, 2009.

4 So Stipulated.

5  
6 DATED: November 21, 2008

Respectfully submitted,

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8 JOSEPH P. RUSSONIELLO  
United States Attorney

9 /s  
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11 MELISSA K. BROWN  
Assistant United States Attorney

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14 Dated: November 21, 2008

/s  
15 E.K. WADE  
Pro Se Plaintiff

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1                   **[PROPOSED] ORDER**

2                   Pursuant to the stipulation of the parties, the non-expert discovery cut-off is moved from  
3 December 12, 2008 to February 9, 2009.

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5                   **IT IS SO ORDERED**

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7                   Dated: November 25, 2008

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